



COMMONWEALTH OF
PUERTO RICO
Environmental Quality Board
Chairman's Office

August 30, 2016

Mrs. Judith A. Enck
Regional Administrator
USEPA-REGION II
290 Broadway – 25th Floor
New York, New York 10007-1866

RE: State Implementation Plan for the Lead Nonattainment Area in Arecibo, Puerto Rico

Dear Mrs. Enck:

On October 15, 2008, the United States Environmental Protection Agency (USEPA) substantially strengthened the National Ambient Air Quality Standard (NAAQS) for Lead. The new standard, 0.15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) measured as a rolling three-month average, is at least 10 times more stringent than the previous standard of $1.5\mu\text{g}/\text{m}^3$. As part of the implementation of the new air monitoring requirements, in January 2010 a new source oriented Federal Reference Method (FRM) monitor was established at Arecibo, near The Battery Recycling Company, Inc. (TBRCI). The data captured by the monitor exceeded the new lead NAAQS. On November 22, 2011 (76 FR 72097) the USEPA notified the designation for the 2008 Lead National Ambient Air Quality Standard (NAAQS). The Designation Areas for Puerto Rico are as follows: Non-attainment for a 4 km radius around The Battery Recycling Co. (TBRCI), in the municipality of Arecibo. These designations were effective on December 31, 2011.

For areas designated as nonattainment, states or territories must develop a State Implementation Plan that meets the requirements of Section 172(c) of the Clean Air Act (CAA). To meet these requirements, the Puerto Rico Environmental Quality Board (PREQB) submitted to EPA a State Implementation Plan (SIP) on January 30, 2015. Emission Inventory and Emission Modeling of the submitted SIP included facilities of the Arecibo Area that reported emissions. Such facilities were: Safetech Corporation, ANJ Airport, PREPA-Cambalache and TBRCI. TBRCI was identified as the major contributor to the lead emissions in the Arecibo Non-attainment area. The lead emissions in the Arecibo Area began to decrease significantly after June 2014 due to the fact that TBRCI was not in operation.

On August 2015, PREQB started a new revision of the Arecibo Lead SIP to update the Emission Inventory of the Arecibo Area and the Emission Modeling. The SIP revision was prepared following the

guidelines and recommendations of the EPA. The proposed revised Arecibo Lead SIP addresses the change in TBRCI's operating status, has been approved by EPA and was made available for public comment and participation.

As required under Section 110(a) of the Clean Air Act (CAA), we are submitting the *State Implementation Plan for the Lead Nonattainment Area in Arecibo, Puerto Rico* and all supporting documents which demonstrates our legal authority, and our ability for the implementation, maintenance, and enforcement of the NAAQS for lead. As a result of the aforementioned submittal, EQB is also withdrawing the January 30, 2015 SIP package.

If you have any questions related to this matter, please feel free to contact me or my staff at 787-767-8056.

Cordially,



Weldin F. Ortiz Franco
Chairman